

Volume 1, Pages 1-46

Exhibit: 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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DAVID SETH WORMAN, et al.,
Plaintiffs,

vs.

CHARLES D. BAKER, in his official
capacity as Governor of the
Commonwealth of Massachusetts, et al.,
Defendants

* * * * *

Rule 30(b)(6) DEPOSITION OF EXECUTIVE OFFICE OF
PUBLIC SAFETY AND SECURITY (by Michaela Dunne) and

MICHAELA DUNNE, Individually
Wednesday, August 30, 2017, 1:06 p.m.
Campbell Campbell Edwards & Conroy
One Constitution Plaza, Third Floor
Charlestown, Massachusetts 02129

----- Alan H. Brock, RDR, CRR-----

C.J. Reporting
P.O. Box 1373
Andover, Massachusetts 01810
617.763.1725

1 Q. Are you able to do that with respect to
2 assault weapons?

3 A. No.

4 Q. Why not?

5 A. The assault weapons -- so in Massachusetts
6 there are a certain number of assault weapons that
7 are enumerated in the statute. So by that
8 definition we would be able to look at the make and
9 model and presume that those are assault weapons
10 just by the fact that they're enumerated in the
11 statute. Any other firearm that could be considered
12 an assault weapon under the Federal assault weapons
13 definition we wouldn't be able to tell, because we'd
14 have to physically inspect the firearm.

15 Q. Okay. So it's fair to say that the records
16 that are kept by the Firearms Records Bureau slash
17 EOPSS wouldn't allow for a determination of the
18 number of assault weapons in Massachusetts.

19 A. Correct.

20 Q. Now, for when we have individual sales,
21 what data is transferred for that?

22 A. The same data is transmitted as it would be
23 for a gun shop, except the buyer and seller, it
24 would be all of their information -- so the name,